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August 31, 2018

**VIA ECF AND HAND DELIVERY**

Honorable Sarah Netburn  
U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

We write in connection with the *Ashton* plaintiffs' pending application for final judgments against the Islamic Republic of Iran for certain non-immediate family members of individuals killed in the September 11, 2001 terrorist attacks which we filed on July 19, 2018. *See* ECF Doc. Nos. 4058-4060. That motion was filed on behalf of twenty-five (25) non-immediate family members that we believed met this Court's criteria for eligibility for final solatium judgments, and it was supported by sworn declarations from each non-immediate family member about the nature of their relationship with the September 11th victim. *See* ECF Doc. Nos. 4060-2; 4060-3.

In order to participate in Round Two of the United States Victims of State Sponsored Terrorism ("USVSST") Fund, according to the USVSST Fund administrators and the USVSST Fund rules, our clients must submit their applications - which must include final judgments and proof of service - by September 14, 2018. The USVSST Fund currently anticipates distributing funds in Round Two from qualifying deposits in part from the recent settlement of the suit against ZTE Corporation. While there may be additional distributions, as of now we have not been advised of other expected future deposits to the USVSST Fund and, therefore, do not know whether there will be funds later to compensate judgment holders. It is critical for our clients, should they be eligible to obtain a final solatium judgment, to have such judgment in hand and served before the current September 14, 2018 deadline.

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To the extent this Court can rule on the pending motion in favor of the *Ashton* non-immediate family members, we respectfully request that any such decision be rendered prior to September 7, 2018, which will allow time for translation and service prior to the September 14, 2018 deadline.

Respectfully submitted,  
KREINDLER & KREINDLER, LLP

/s/ Andrew J Maloney  
Andrew J. Maloney, III (8684)

cc: Honorable George B. Daniels  
All Counsel via ECF